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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DEBORAH MOLLER, an individual
and successor –in-interest of
BRET BREUNIG, deceased,

Plaintiffs,

vs.

COUNTY OF SAN BERNARDINO, a
public entity; BREANA FITE

Defendant.

MASTER CASE NO. 5:22-CV-01306-
DSF-MAR

Assigned for All Purposes to:
Hon. Dale S. Fischer– Courtroom 7D

STIPULATION OF THE PARTIES
RE COUNTY OF SAN
BERNARDINO VICARIOUS
LIABILITY

Trial Date: August 13, 2024

Complaint filed: 07/07/22

FAC filed: 09/19/22

SAC filed: 12/08/22

TAC filed: 01/30/23

STIPULATION OF THE PARTIES RE COUNTY OF SAN BERNARDINO
VICARIOUS LIABILITY

**TO THE COURT, THE PARTIES, AND THE ATTORNEYS OF
RECORD:**

Plaintiff DEBORAH MOLLER, and Defendants COUNTY OF SAN BERNARDINO and BREANA FITE (collectively “the Parties”), by and through their undersigned counsel, hereby submit the following stipulation regarding the vicarious liability of Defendant COUNTY OF SAN BERNARDINO:

IT IS HEREBY STIPULATED, by and between the Parties, that at all relevant times, Defendant BREANA FITE was acting in the course and scope of her employment with Defendant COUNTY OF SAN BERNARDINO.

IT IS HEREBY FURTHER STIPULATED, by and between the Parties, that Defendant COUNTY OF SAN BERNARDINO is vicariously liable for any damages against Defendant BREANA FITE, and only if damages are found against Defendant BREANA FITE.

DATED: August 8, 2024

LYNBERG & WATKINS
A Professional Corporation

By: /s/ Shannon L. Gustafson
SHANNON L. GUSTAFSON
AMY R. MARGOLIES
ANITA K. CLARKE
Attorneys for Defendants,
COUNTY OF SAN BERNARDINO and
BREANA FITE

DATED: August 8, 2024

CONLOGUE LAW, LLP

By: /s/ Kevin S. Conlogue
ASHLEY M. CONLOGUE
KEVIN S. CONLOGUE
Attorneys for Plaintiff
DEBORAH MOLLER

**STIPULATION OF THE PARTIES RE COUNTY OF SAN BERNARDINO
VICARIOUS LIABILITY**

1 I certify that all parties to this document have consented to its filing and to the
2 language contained herein and have authorized the undersigned to affix their
3 electronic signatures.

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5 DATED: August 8, 2024

LYNBERG & WATKINS
A Professional Corporation

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7 By: /s/Shannon L. Gustafson
8 **SHANNON L. GUSTAFSON**
9 **AMY R. MARGOLIES**
10 **ANITA K. CLARKE**
Attorneys for Defendants,
COUNTY OF SAN BERNARDINO and
BREANA FITE